

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
: No. 4-15-01441
MUSSI REALTY, LLC, :
: Chapter 11
Debtor-in-Possession :

APPLICATION BY DEBTOR-IN-POSSESSION
TO APPOINT ITS OWN ATTORNEY

TO THE HONORABLE JOHN J. THOMAS, BANKRUPTCY JUDGE:

The Application of Mussi Realty, LLC, Debtor-in-Possession herein, respectfully represents:

1. On the 8th day of April, 2015, your Applicant filed a Chapter 11 petition in the above-captioned case and is now acting as Debtor-in-Possession.

2. Your Applicant wishes to employ Donald M. Hahn, Esquire and the law firm of Stover, McGlaughlin, Gerace, Weyandt & McCormick, P.C., duly authorized to practice in this Court.

3. Your Applicant has selected them for the reason that they have had considerable experience in matters of this character and your Applicant believes they are well qualified to represent him in this proceeding.

4. The professional services the said attorneys are to perform are:

- (a) To prepare all forms, petitions, orders, applications and other legal papers and documents filed with the Bankruptcy Court for the Debtor-in-Possession;
- (b) To advise the above-captioned Debtor-in-Possession on legal matters;
- (c) To conduct any negotiations covering legal rights for the above-captioned Debtor-in-Possession;

- (d) And such other legal services as may arise by virtue of assets which may be located.

5. Your Applicant wishes to employ Donald M. Hahn, Esquire and the law firm of Stover, McGlaughlin, Gerace, Weyandt & McCormick, P.C., under a general retainer at the following rates:

Research, correspondence, negotiations, advice, consultation, case preparation, investigation	\$175.00 per hour
Preparation of Pleadings, Applications, Reports, Petitions for Trustee	\$175.00 per hour
Preparation of Draft Orders	\$175.00 per hour
Appearance in any Court as Attorneys for Trustee	\$175.00 per hour
Travel: Travel Time	\$175.00 per hour
Mileage	\$ 0.56 per mile
Expenses (Meals, Lodging)	Actual
Photocopies	\$ 0.25 per copy

6. Applicant requests that Donald M. Hahn, Esquire and the law firm of Stover, McGlaughlin, Gerace, Weyandt & McCormick, P.C., be employed as attorneys in this capacity, and represents that they have no adverse interest to the above-captioned Debtor-in-Possession or the estate in the matters upon which they are to be engaged for your Applicant, and that their employment would be in the best interests of the estate.

WHEREFORE, Applicant prays that he be authorized to appoint Donald M. Hahn, Esquire and the law firm of Stover, McGlaughlin, Gerace, Weyandt

& McCormick, P.C., as attorneys for him in this case, and that he have such other and further relief as is just.

Dated at State College, Pennsylvania, this the 9 day
of April, 2015.

MUSSI REALTY, LLC

BY: /s/ Lynda L. Mussi
Lynda L. Mussi, President

b.dattaptg